

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
Civil Action No. 3:20-cv-518**

MARJORIE ACEVEDO,

Plaintiff,

v.

TEUPEN NORTH AMERICA, INC.

Defendant.

**MARJORIE ACEVEDO  
SUPPLEMENTAL DECLARATION IN  
SUPPORT OF PLAINTIFF'S MOTION  
FOR SANCTIONS**

I, Marjorie Acevedo, declare the following is true and correct under the penalty of perjury:

1. I am the plaintiff in this matter and I make this declaration in further support of my Motion for Rule 11 Sanctions, in reply to Defendant's Opposition to my motion.
2. I am aware that Defendant produced documents in opposition to my motion, including Verizon records. (ECF No. 16-2).
3. The records produced by Defendant indicate the value of my iPhone trade-in was approximately \$400. While I do not have reason to dispute the records, the original purchase price of the iPhone 7 Plus (purchased about one year earlier) was approximately \$860, which I had been paying in monthly installments. In order to trade in the iPhone to Verizon in the summer of 2018, I had to personally pay off the remaining approximately \$570 owed. Defendant did not pay any amount for the iPhone 7.

4. Regarding my iPhone 7 trade-in during the summer of 2018, Defendant never reimbursed me for the value of my iPhone, or the monthly Verizon credit Defendant appears to have received on my behalf.

*Marjorie Acevedo*

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Marjorie Acevedo

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